

FILED**12/23/2023**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

KENDALL SULLIVAN and
TROY LUCKETTCASE NUMBER: **23 CR 657****CRIMINAL COMPLAINT**


I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about December 22, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, the defendants violated:

*Code Section*Title 18, United States Code, Section
2113(a)*Offense Description*

by intimidation, took from the person or presence of bank employees approximately \$9,433 in United States currency belonging to, or in the care, custody, control, management, or possession of, Byline Bank, located at 7050 North Western Avenue, Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation

This criminal complaint is based upon these facts:

X Continued on the attached sheet.



TIMOTHY BACHA

Special Agent, Federal Bureau of Investigation
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: December 23, 2023

2:00 p.m.

*Judge's signature*City and state: Chicago, IllinoisHEATHER K. MCSHAIN, U.S. Magistrate Judge*Printed name and title*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, TIMOTHY BACHA, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since approximately June 2006. My current responsibilities include the investigation of violent crimes, including, among others, kidnapping, bank robbery, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that KENDALL SULLIVAN and TROY LUCKETT have committed the offense of bank robbery, in violation of Title 18, United States Code, Section 2113(a) (the “**Subject Offense**”).

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging KENDALL SULLIVAN and TROY LUCKETT with the **Subject Offense**, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

4. The statements in this affidavit are based on multiple sources, including but not limited to: my personal knowledge, information provided to me by other law enforcement agents, my review of photos and video recordings related to this investigation, my review of law enforcement databases, my review of reports and

documents related to this investigation, my training and experience and the training and experience of other law enforcement agents and officers with whom I work, and information provided to me by persons with knowledge regarding relevant facts.

I. FACTS SUPPORTING PROBABLE CAUSE

5. As explained in further detail below, there is probable cause to believe that on or about December 22, 2023, KENDALL SULLIVAN and TROY LUCKETT robbed the Byline Bank located at 7050 North Western Avenue in Chicago (“Byline Bank”), in the Northern District of Illinois, Eastern Division, in violation of Title 18, United States Code, Section 2113(a).

6. According to law-enforcement review of Byline Bank surveillance footage and interviews set forth in more detail below, two robbers, who both appeared to be black men in approximately their 20s, robbed the Byline Bank while armed with handguns. One of the robbers (“Robber 1”) was wearing a dark green hooded raincoat with a small logo on the left side of the chest, and a blue surgical mask, and the other (“Robber 2”) was wearing a blue jacket, a black shower cap, a blue surgical mask, and HyFlex gloves,¹ and carrying a blue bag which the robbers used for the cash from the bank. As set forth below, the cash the robbers took from Byline Bank included a bank global positioning system (“GPS”) tracker, which aided law enforcement in the swift apprehension of the robbers. Additionally, during the course of the armed robbery one

¹ According to open-source research, HyFlex appears to be a brand of protective work gloves and sleeves.

of the robbers dropped a cell phone in the bank, which law enforcement recovered after the robbery.

7. As explained further below, with the assistance of the GPS tracker, and less than eight minutes after the robbery, law enforcement located and observed two cars in the area of the tracker—a silver Lexus bearing plate number DB29981, and a dark gray Pontiac Bonneville with no license plates—as they turned and began driving the wrong way down a one-way street. Law enforcement stopped the Lexus, and the driver, later identified as KENDALL SULLIVAN, fled from the car on foot with a blue jacket and a blue bag. Law enforcement detained SULLIVAN shortly thereafter, recovered the blue jacket and the blue bag, found two handguns that appeared consistent with those used by the bank robbers at Byline Bank inside the jacket pockets, and found the bank GPS tracker and bulk U.S. currency in the exact amount taken from Byline Bank inside the blue bag. SULLIVAN also later signed a written waiver of his *Miranda* rights and gave an audio- and video-recorded statement where, in summary, he admitted to having robbed the Byline Bank with another individual who he would not name to law enforcement.

8. Law enforcement also spotted the Pontiac Bonneville near the area where the Lexus had been stopped, and the driver of the Pontiac was later identified as TROY LUCKETT. Law enforcement later recovered from the Pontiac a blue surgical mask appearing consistent with those worn by the robbers, HyFlex gloves appearing consistent with those worn by Robber 2, a dark green hooded raincoat

appearing consistent with the one Robber 1 was wearing inside the Byline Bank, and the cases for the two handguns from SULLIVAN's jacket.

9. At separate show-ups after SULLIVAN and LUCKETT were detained, three witnesses to the robbery each separately identified both SULLIVAN and LUCKETT as the robbers.

A. December 22, 2023 Robbery of Byline Bank

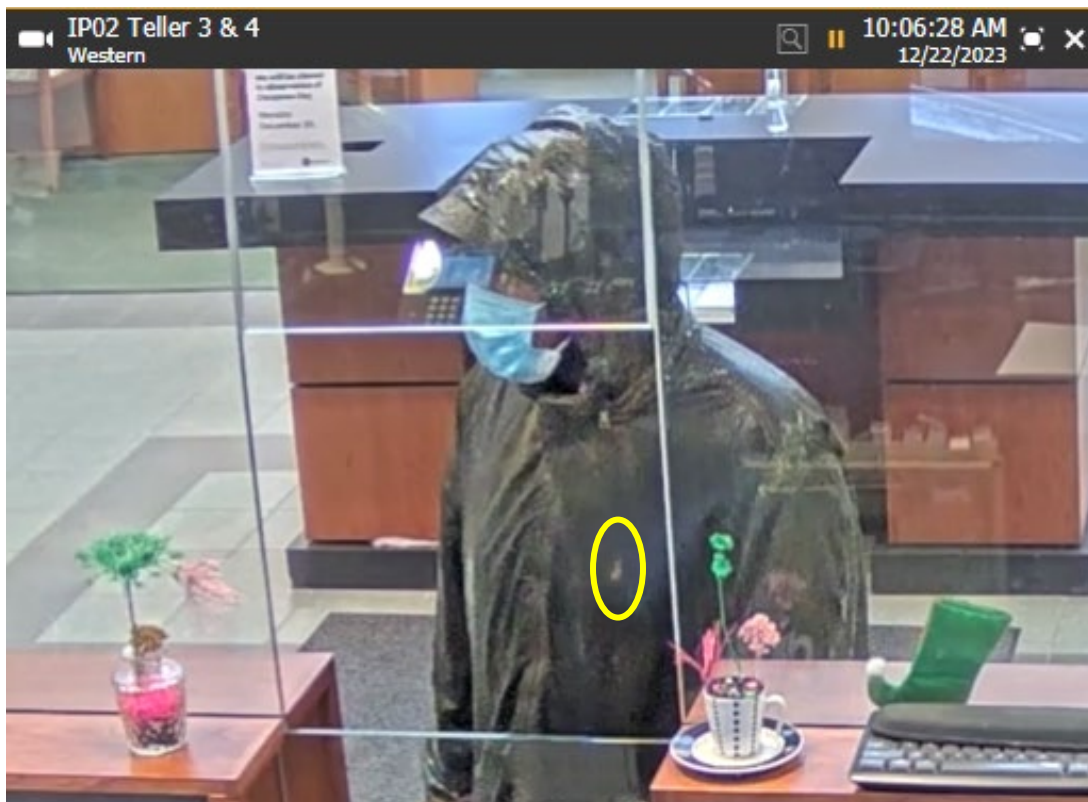
10. According to information provided by Byline Bank employees, customer interviews, and a review of security video surveillance, on or about December 22, 2023, at approximately 10:06 a.m., two individuals armed with firearms, and later identified as SULLIVAN and LUCKETT, robbed the Byline Bank located at 7050 North Western Avenue, Chicago, Illinois. During the course of the robbery, the branch's manager, two tellers ("Teller 1" and "Teller 2"), and two customers were present. As explained below, law enforcement subsequently interviewed these witnesses and, among other things, recovered and reviewed relevant security footage.

11. In summary, and according to the Byline Bank branch manager ("branch manager"), on the morning of December 22, 2023, the branch manager was on the phone handling a call when a black man, appearing to be in his 20s with short braids sticking out of a black hat ("Robber 1"), entered the bank. The branch manager described Robber 1 as wearing a blue surgical mask, with a black jacket and pants. Robber 1 approached the branch manager and asked about opening an account. The branch manager gestured to Robber 1 that they were on the phone and, while doing

so, observed another black man, also appearing to be in his 20s and wearing a black hat, blue surgical mask, and a black jacket (“Robber 2”), walk toward a teller’s station.

12. In summary, and according to the branch manager, at that point, the branch manager heard Robber 2 state that this was a robbery, and further observed Robber 2 hand a blue bag to a teller. Robber 2 then told the teller to put all the money inside. The branch manager also saw Robber 1 display a handgun in his hand at or around the same time.

13. Byline Bank surveillance footage, which recorded the robbery, was recovered and reviewed by law enforcement. The first security footage still, immediately below, depicts Robber 1 wearing a hooded dark raincoat with a small logo on the left side of the chest (circled in yellow), and a blue surgical mask.



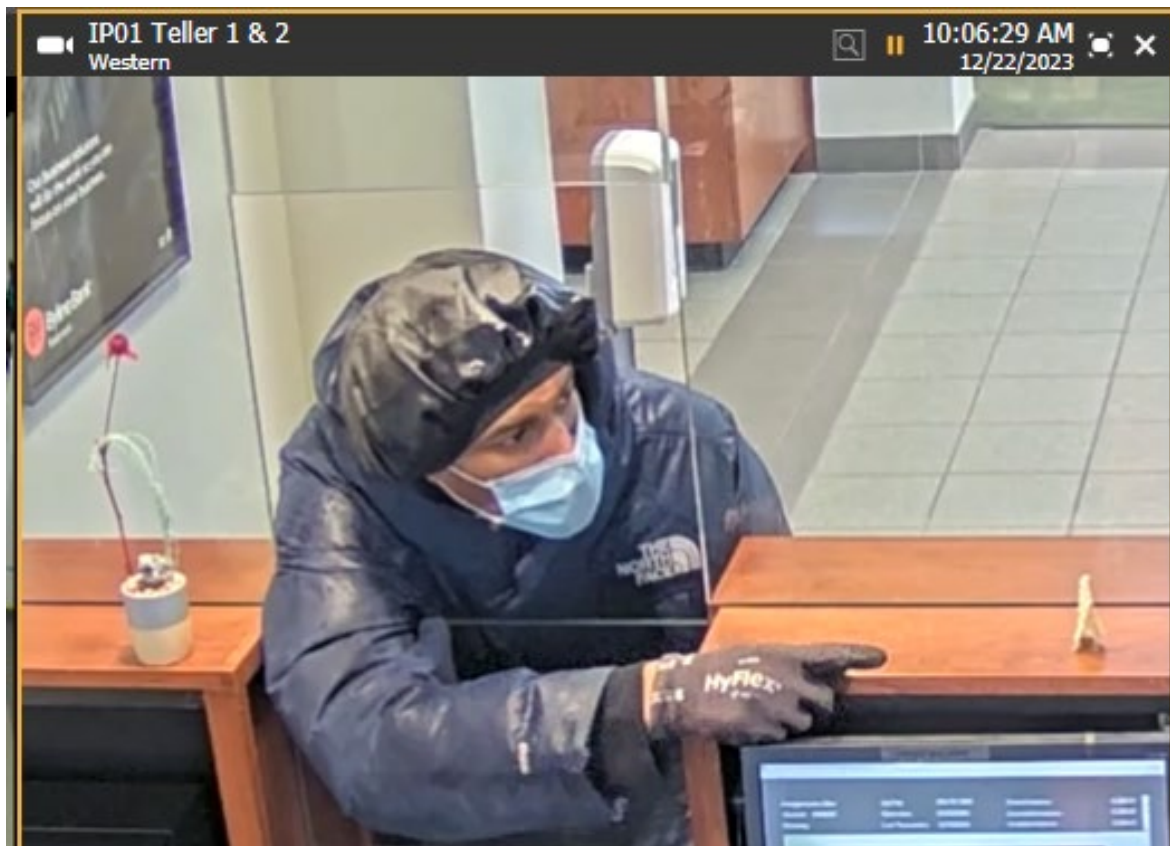
14. A second security footage still, immediately below, depicts both Robber 1 (on the left) and Robber 2 (on the right) holding their handguns, one of which appears to be brown in color (Robber 1's gun on the left), and the other of which appears to be black in color (Robber 2's gun on the right). Robber 2 appears to be wearing a blue jacket, black shower cap, and gloves.



15. According to Byline Bank Teller 1, on the morning of December 22, 2023, Teller 1 was working at the bank when Robber 1 approached the branch manager while Robber 2 pointed a gun at Teller 1. Teller 1 described Robber 2 as a black male in his 20s wearing a blue surgical face mask, and a hooded dark jacket with dreads coming out of the hood, and carrying a small black handgun.

16. According to Teller 1, Robber 2 told Teller 1, in summary, to put your hands up, this is a robbery. Robber 2 then handed Teller 1 a blue bag for the cash from Teller 1's drawer, and told her, in summary, to fill up the bag. Teller 1 placed the cash inside and gave the bag back to Robber 2. Robber 2 then moved down the counter to Teller 2, and held out the bag. Teller 1 then saw Teller 2 put money inside the bag. Teller 1 also said that she saw two customers enter during the robbery, and that Robber 1 directed the customers to a corner of the bank.

17. A third security footage still, immediately below, recorded Robber 2, wearing what appears to be a black shower cap, a blue North Face jacket, a blue surgical mask, and HyFlex gloves.



18. According to Teller 2, Teller 2 came out from a back room when the robbers were already inside. Teller 2 described Robber 2 as appearing to be in his 20s wearing a hooded black jacket and a blue surgical mask. According to Teller 2, Teller 2 heard one of the robbers say, in summary, that this is a robbery. Teller 2 then began preparing cash from their drawer, with a bank GPS tracker inside, and when Robber 2 held the blue bag open for her, Teller 2 then placed the cash and GPS tracker inside.

19. According to law enforcement review of the surveillance footage from inside the bank, during the robbery, two bank customers, Individual A and Individual B, entered the bank together and appeared to be ordered into a back room of the bank by Robber 1. Individual A related that upon seeing the two robbers with their guns inside the bank, Individual A and Individual B attempted to exit, but Robber 1 pointed the gun at them, grabbed Individual B by their shirt collar, and ordered both customers into a bank office and told them to lie on the floor. Individual A and Individual B did as they were instructed by Robber 1 and remained on the floor until after they heard the robbers leave the bank. Individual A, in summary, described Robber 1 as being skinny, wearing all black and a blue surgical mask, and armed with a black gun.

20. Responding law enforcement arrived at Byline Bank shortly after the robbery, and located a cell phone on the floor of the bank, in approximately the area where Robber 1 had been standing. A subsequent review of the surveillance footage

of the robbery showed a phone appearing to drop from Robber 1's pocket during the robbery.

21. Following the robbery, an audit of Teller 1's and Teller 2's drawers showed that approximately \$9,433.00 was taken during the robbery, and law enforcement obtained a copy of Byline Bank's FDIC certificate showing that its deposits were insured at the time of the robbery.

B. Identification of SULLIVAN and LUCKETT as the Robbers

22. By no later than approximately 10:13 a.m., approximately six minutes after the robbers left the bank, law enforcement followed the GPS tracker from the Byline Bank as it drove through Chicago and headed southbound down North Ridge Boulevard from the Byline Bank, toward the direction of West Devon Avenue.

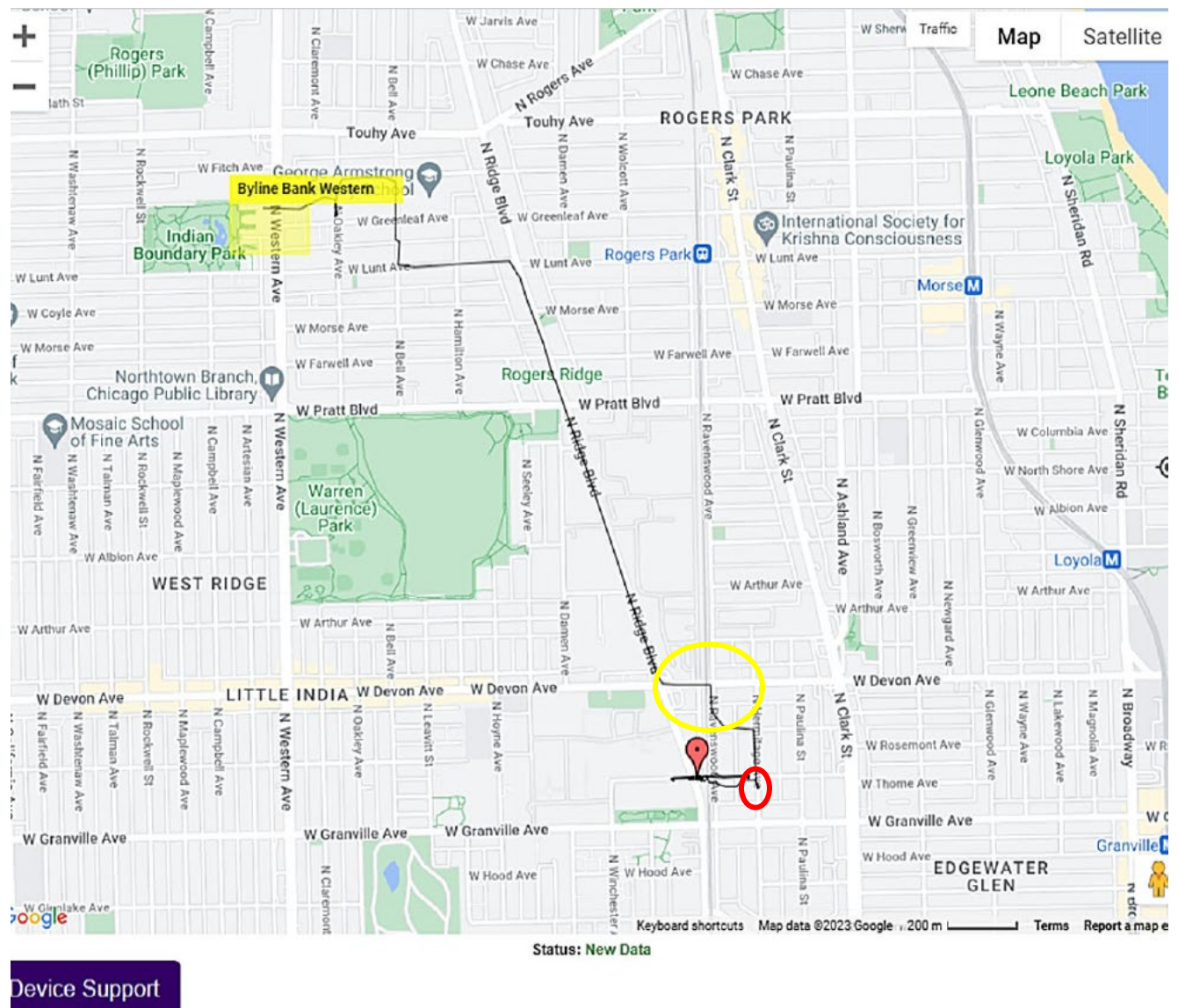
23. According to Chicago Police,² police followed the approximate location of the tracker noticed two cars—a silver Lexus with tinted windows bearing license plate number DB29981,³ and a dark gray Pontiac Bonneville bearing no license plates⁴—in the area of the GPS tracker. When the police turned to follow the two cars, they observed both cars turn from West Devon Avenue and both begin driving the wrong way (southbound) down the northbound side of North Ravenswood Avenue,

² This incident occurred in the last 24 hours and, at the time of this submission, the CPD personnel assigned to this case were still in the process of finishing and finalizing their reports.

³ According to National Crime Information Center (NCIC) records, the license plate for the Lexus is registered to another individual with the last name "Sullivan" at the same Chicago address listed as KENDALL SULLIVAN's residence as of 2023 on his Chicago Police Department rap sheet.

⁴ According to NCIC records, the VIN for the Pontiac Bonneville is associated to another individual whose relationship with TROY LUCKETT is presently unknown.

on the east side of the train tracks. The approximate route of the GPS tracker from the Byline Bank following the robbery, obtained by law enforcement from the GPS tracking company, is depicted below, and the yellow circle shows the direction of the tracker likewise turning off of West Devon Avenue and heading the wrong way (southbound) down the northbound side of North Ravenswood Avenue.



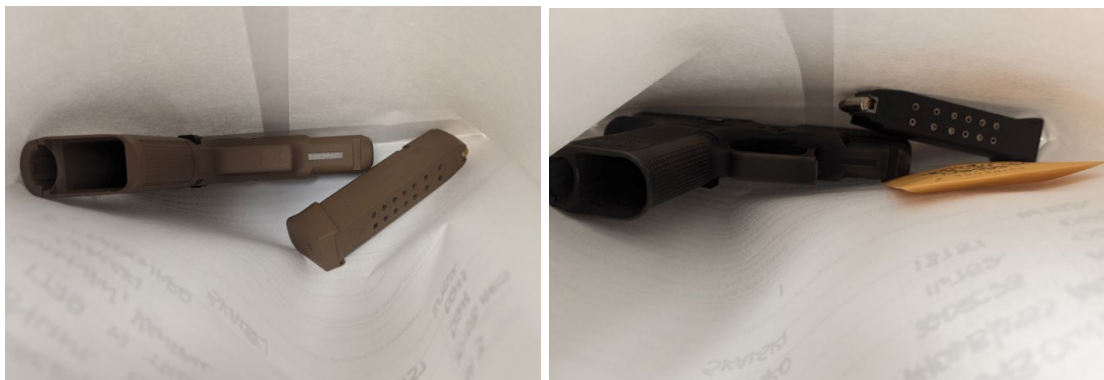
24. According to the Chicago Police, as police followed the cars, they observed that the Lexus, which SULLIVAN was later determined to be driving, was

further ahead with the Pontiac Bonneville following behind, and that the Bonneville, which LUCKETT was located in shortly thereafter, seemed to be slowing down, and periodically braking, as though to slow down the officers and block them from the Lexus. The Lexus later turned onto North Hermitage Avenue, while the Bonneville continued driving down West Highland Avenue, and the CPD sergeants continued following the Lexus. Another CPD vehicle then blocked and stopped the Lexus in the area of North Hermitage Ave, south of West Thome Avenue (circled in red above). The driver of the Lexus, later identified as SULLIVAN, immediately fled his vehicle on foot, holding a blue jacket and a blue bag, and Chicago Police pursued SULLIVAN on foot.

25. According to Chicago Police, while SULLIVAN was running from the Chicago Police they saw SULLIVAN toss the jacket he was carrying to the ground as he ran. One of the officers picked up the jacket, as well as a nearby wallet that appeared to have fallen out of the jacket,⁵ and continued in pursuit. The jacket recovered was a blue North Face jacket, appearing consistent with that worn by Robber 2 during the robbery as depicted on the Byline Bank security footage. In the pockets of the jacket, law enforcement found two handguns appearing consistent in both color and size with those used by Robber 1 and Robber 2 during the bank robbery: (1) a loaded brown Glock model 19X 9mm semi-automatic pistol bearing serial number BXGZ096, and (2) a loaded black Glock model 19 9mm semi-automatic

⁵ The wallet contained cards with SULLIVAN's name and identifiers. SULLIVAN's CPD rap sheet and criminal history show that he is approximately 21 years old, consistent with the age estimate provided by the witnesses to the bank robbery

pistol bearing serial number AGHZ945, both pictured (after being recovered and made safe) below.



26. According to Chicago Police, SULLIVAN was detained near the train tracks by North Ravenswood Avenue, shortly after he dropped the blue bag that he had been carrying on the ground nearby. The officers recovered the blue bag and saw in plain view bulk U.S. currency inside, later determined to total \$9,433, consistent with the amount taken from the Byline Bank, and including the Byline Bank GPS tracker.

27. During a subsequent inventory search of SULLIVAN's Lexus, law enforcement found, among other things, a blue surgical mask appearing consistent with that worn by the bank robbers, in the center console (circled in yellow immediately below); a black shower cap on the front floorboard, appearing consistent with the black shower cap worn by Robber 2 inside the bank (not visible below); and a single black leather glove with a brown band on the wrist (also circled in yellow immediately below).



28. After SULLIVAN was detained, Chicago Police spotted the Pontiac Bonneville with no license plates, which had been appearing to try to slow down and block the Chicago Police from curbing the Lexus that SULLIVAN had been driving, in the area where SULLIVAN had left his Lexus, near the intersection of North Hermitage Avenue and West Thome Avenue. Chicago Police approached and found the Bonneville's driver, now identified as TROY LUCKETT, in the driver's seat.

29. Law enforcement later observed in plain view through the windows of the Bonneville LUCKETT was driving, a blue surgical mask near the driver's seat, appearing consistent with those worn by the robbers inside the Byline Bank; a dark

green hooded jacket in the backseat, appearing consistent with the dark jacket worn by Robber 1 inside the bank; and a camo-print backpack with yellow trimming on the front passenger seat.



30. During a subsequent inventory search of the Bonneville, the vehicle in which LUCKETT was located, law enforcement found inside the camo-print backpack two cases for Glock firearms, with serial numbers consistent with those of the two Glock pistols found in SULLIVAN's jacket and described above. Law enforcement also found a pair of HyFlex gloves under the front passenger seat, and a single HyFlex glove on the front passenger seat, which appeared consistent with those worn by Robber 2 in the bank, as well as the black leather glove with a brown band on the wrist that matched with the single glove with the same brown band found on the front passenger seat of SULLIVAN's Lexus. Law enforcement also confirmed that the dark

green hooded jacket in the backseat had the small logo on the left side of the chest, consistent with the jacket worn by Robber 1 in the Byline Bank (see logo circled in yellow below, and compare with first still in paragraph 13 above).



31. According to the Chicago Police, law enforcement also brought Teller 1 and the two customers, described above, who were present for the robbery to the area of Thome and Hermitage for separate show-ups. In summary, each witness was placed in a separate car, and each was separately driven past first one and then the other of the two suspects (SULLIVAN AND LUCKETT). And in summary, all three witnesses positively identified SULLIVAN and LUCKETT as the robbers from the bank.⁶

⁶ According to law enforcement, one of the customers, Individual B, was primarily a Spanish-language speaker, and during interactions with law enforcement, he required translation assistance, which at times was provided by Individual A.

32. SULLIVAN later signed a written waiver of his *Miranda* rights and gave an audio- and video-recorded statement to law enforcement, in which, among other things, he ultimately admitted to having robbed the Byline Bank, and that another person had robbed the bank with him, though he refused to name the other person.

33. LUCKETT also signed a written waiver of his *Miranda* rights and gave an audio- and video-recorded statement to law enforcement, in which he provided his name and identifiers,⁷ denied any involvement in the bank robbery, and claimed, among other things, that he was in the area on his way to meet with someone he had been in touch with on the Grindr application.⁸ LUCKETT did not have a cell phone on him at the time he was detained, and when asked how he could have been meeting with someone from Grindr without a cell phone, he responded, in sum and substance, that law enforcement was trying to “trick” him.

34. During the interview, LUCKETT also denied knowing SULLIVAN, but—in addition to the items found in the car LUCKETT was driving which linked him to items found in SULLIVAN’s jacket and car, already described above—law enforcement conducted an open search of LUCKETT and SULLIVAN’s names in Facebook and found that a public page under the name “Troy Luckett,” with a profile photo of LUCKETT, was Facebook friends with a public page under the name “Jon Madison (‘Lilbroman’),” identified with the URL

⁷ LUCKETT’s CPD rap sheet and criminal history show that he is approximately 23 years old, consistent with the age estimate provided by the witnesses to the bank robbery.

⁸ Based on my training and experience, I know Grindr is a social-networking app for the LGTBQ community, which is often used on cell phones.

“<https://www.facebook.com/kendall.sullivan.52>,” and including a photo of SULLIVAN.⁹

35. During LUCKETT’s interview, when law enforcement asked LUCKETT about this connection on Facebook between the LUCKETT and SULLIVAN Facebook profile pages, LUCKETT claimed that he accepted friend requests from many people he did not really know because LUCKETT is a rapper.

36. According to law enforcement review of a POD camera located at approximately 6401 North Ridge Blvd, less than two miles southeast of the Byline Bank, at approximately 9:47:53 a.m.—that is, approximately 18 minutes *before* the bank robbery, a dark gray Pontiac Bonneville with no plates—consistent with the vehicle LUCKETT was driving after the robbery—was following behind the silver Lexus bearing license plate DB29981 that SULLIVAN was later found driving as both vehicles headed northbound on North Ridge Boulevard, toward the location of the

⁹ Law enforcement who personally interacted with LUCKETT on the day of the robbery reviewed the photograph on the above-described Facebook public page under the name “Troy Luckett,” and it appeared to be a photograph of LUCKETT, the same person who drove the Bonneville. Further, law enforcement who personally interacted with SULLIVAN reviewed a photograph on the above-described Facebook public page under the name “Jon Madison (‘Lilbroman’),” identified with the URL <https://www.facebook.com/kendall.sullivan.52>, and it appeared to be a photograph of SULLIVAN, the same person who drove the Lexus.

Byline Bank (still from POD camera below).



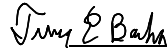
37. The same POD camera also later captured partial images of both a silver sedan, appearing consistent with the Lexus SULLIVAN was driving, and a dark gray sedan with no license plate, appearing consistent with the Bonneville in which LUCKETT was located, heading southbound down North Ridge Boulevard at approximately 10:13:41 a.m., shortly *after* the bank robbery, and consistent with the GPS tracker movement at approximately that time (discussed and depicted above in paragraph 23).

II. CONCLUSION

38. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that, on or about December 22, 2023, KENDALL SULLIVAN and TROY LUCKETT, by intimidation, did take United States currency belong to and in the care, custody, control, management, and possession of Byline Bank, located in the

Northern District of Illinois, the deposits of which were insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT.



TIMOTHY BACHA

Special Agent, Federal Bureau of
Investigation

SWORN TO AND AFFIRMED by telephone December 23, 2023. 2:00 p.m.



Honorable HEATHER K. MCSHAIN
United States Magistrate Judge